

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Solutia, Inc.,
A Wholly Owned Subsidiary of
Eastman Chemical Company
500 Monsanto Avenue
Sauget, Illinois, 62206**

ATTENTION:

**Donn Haines
HSES Specialist**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Solutia, Inc., a wholly owned subsidiary of Eastman Chemical Company, (Solutia, or you), to submit certain information about the W.G. Krummrich chemical manufacturing facility at, on, or near St. Clair County Parcel No. 01-260-201-003, commonly known as 2301 Falling Springs Road, Sauget, Illinois (hereinafter referred to as "the W.G. Krummrich Plant").¹ Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within **30 calendar days** after you receive this request.

EPA is issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

¹The address listed for the W.G. Krummrich Plant in its Illinois Clean Air Act Permit (No. 163121AAC) is 500 Monsanto Avenue, Sauget, Illinois.

Solutia owns or operates an emission source at Sauget, Illinois. EPA requests this information to determine whether your emission source is complying with the requirements for any CAA permit, the Illinois State Implementation Plan, and any applicable CAA regulations, including, but not limited to, the National Emissions Standards for Hazardous Air Pollutants, and conditions of its operating permit.

Solutia must send all required information to:

Attn: Compliance Tracker, AE-18J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Solutia must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data,

standards and limitations are not entitled to confidential treatment. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

EPA may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Solutia to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Sarah Clark at 312-886-9733.

Date

3/20/18

Edward Nam
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or the Illinois State Implementation Plan, the National Emission Standards for Hazardous Air Pollutants (NESHAP), or the New Source Performance Standards.

1. The terms “document” and “documents” means any object that records, stores, or presents information, and includes, without limitation, email, writings, memoranda, contracts, agreements, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy shall also include attachments to or enclosures with any document.
2. The term “Facility” shall include those structures and emission units included in the CAAPP or Title V Permit ID No. 163121AAC issued on May 13, 2008 to Solutia, Inc., for the W.G. Krummrich Plant and all subsequent modifications.
3. The term ‘present’ means the date of receipt of this request.
4. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating, or relevant to.

Appendix B

Information You Are Required to Submit to EPA

Solutia must submit the following information regarding the Facility pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a):

1. Provide a copy of each current air construction permit issued to Solutia (or prior ownership entities) for the Facility by the Illinois EPA.
2. Provide a copy of all permit applications submitted to the Illinois EPA from March 2008 to the present.
3. Provide all current and revised potential-to-emit calculations for volatile organic material (VOM), and individual and total hazardous air pollutants (HAPs) for each emission unit at the Facility, with supporting calculations, data, and assumptions.
4. Provide copies of all annual emissions reports submitted to Illinois EPA and the Toxic Release Inventory Program for the Facility for reporting years 2013 through 2017, and include:
 - a. A narrative describing the method used for the annual emissions calculations for each pollutant, including the basis of any emissions factors used; and
 - b. Any documents outlining procedures for calculating annual emissions.
5. Provide copies of all quarterly reports, semi-annual compliance reports, deviation reports, excess emission reports and/or any equivalent documents submitted to Illinois EPA or EPA for the Facility since March 2013.
6. Provide a copy of any current Startup Shutdown and Malfunction Plan (SSMP) utilized at the Facility. If the SSMP has been revised within the past five years, also provide copies of any previous versions dating back to 2013. If not already included in Request 5, provide copies of all startup, shutdown, and malfunction records from March 2013 to the present. At a minimum, include duration of event, cause, excess emissions estimate, if any, and corrective actions taken, if any.
7. Provide all records related to any spills or releases that occurred at the Facility between December 1, 2016 and February 1, 2017, including, but not limited to, the failure of valve ID SV910-6 and the "two spills in December 2016 due to weather/freeze conditions" referenced in the letter sent by Solutia to American Bottoms Treatment Facility on February 1, 2017, and subsequently submitted to EPA on September 14, 2017. Include the corresponding emissions calculations and corrective action(s) taken, if any. You are not required to provide the "Rupture Disc 1-17-17 Release Calc.pdf" or the "Incident – 01.17.2017- Final Report.pdf" previously submitted to EPA.

8. Provide a detailed description for valve ID: SV910-6, (mentioned in the letter sent by Solutia to American Bottoms Treatment Facility on February 1, 2017, and subsequently submitted to EPA on September 14, 2017) including the specific type, operational mechanism, and any incorporated safeguards of the original valve and its replacement.
9. Provide copies of all National Emission Standards for Hazardous Air Pollutants (NESHAP) Initial Notifications and Notifications of Compliance Status submitted to Illinois EPA or EPA and any additional correspondence with Illinois EPA, EPA, and any third parties with whom Solutia consulted regarding the applicability of any part of the NESHAP: Miscellaneous Organic Chemical Manufacturing (40 C.F.R. Part 63, Subpart FFFF) at the Facility.
10. Provide a list of all emissions tests and wastewater sampling conducted at the Facility for any reason, from March 2008 to the present, and provide copies of all emissions test and wastewater sampling reports. Testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. Use the following guidelines for compiling the list and preparing copies of the stack test and wastewater sampling reports:
 - a. **List:** Identify the emissions unit, the date of the test, the federal or state regulation requiring the test (if applicable), the test method(s) used, the physical location of the sample collection points (*e.g.*, before or after emission unit or air pollution control device), and the production rate of the associated emission unit. For each test during which the emission unit was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with Illinois EPA.
 - b. **Copies:** Provide full stack test and/or wastewater sampling reports, including the summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.
11. For the Facility's leak detection and repair (LDAR) program, provide the following, from March 2013 to the present:
 - a. A copy of all applicable notifications and reporting documents required by 40 C.F.R. § 60.487 and/or § 60.487a;
 - b. Any permit deviation reports (quarterly compliance reports) if not already included in an earlier Request; and
 - c. A copy of the most recent components monitoring log, in Microsoft Access format, which lists all components tested and the status of each component inspected during the monitoring period.

12. Provide a process flow diagram or diagrams for the Santoflex process unit and storage tanks, including all tanks/vessels utilized during production and their purpose (e.g. storage, surge control, wastewater, etc.), with the following information:
 - a. Emission unit ID;
 - b. Emission unit installation date;
 - c. Any air pollution control or solvent recovery unit including the following for each unit: unit ID; purpose; collection, destruction, removal, recovery efficiency, as applicable; and regulation, if any, the unit is required to meet; and
 - d. The routing of emissions from each emission unit to each air pollution control or solvent recovery equipment with capture efficiency at each pickup point.
13. Provide a list of all miscellaneous organic chemical manufacturing process units (MCPU) at the Facility, as defined at 40 C.F.R. Part 63, Subpart FFFF. For each MCPU provide:
 - a. A description of the process and the type of process equipment used;
 - b. A process diagram showing the boundaries of the MCPU and points of determination (PODs);
 - c. A list of equipment used in each "unit operation" in the MCPU;
 - d. A list of all tanks/vessels with their purpose (e.g. storage, surge, wastewater, etc.) and group (e.g. Group 1);
 - e. A list of all vents by type (i.e., continuous or batch) and group (i.e., Group 1 or Group 2); and
 - f. A list of all wastewater streams with their ID, source, type (e.g., process, maintenance), group, capture, and destination.
14. Provide detailed piping and instrumentation diagram(s) (PIDs) for the wastewater treatment equipment and associated air pollution control units, including the "Decant Tank," "Stripper," and "Residue Tank" identified on page 6 of the "Compliance Test of the Santoflex Process Thermal Oxidizer" prepared on June 9, 2008 and submitted to EPA on August 3, 2017. Include and identify the following:
 - a. Each equipment and air pollution control unit by the corresponding identification numbers used in the CAAPP or Title V Permit ID No. 163121AAC issued on May 13, 2008 to Solutia, Inc., for the W.G. Krummrich Plant;
 - b. All streams (e.g., process wastewater, clean wastewater, steam, emissions, etc.);
 - c. All valves preceding and following each unit (e.g., valve ID: SV910-6);
 - d. Any and all bypass lines and/or recycle streams; and
 - e. All sensors, including but not limited to, level indicators, flow meters, and thermocouples.

15. Provide a narrative to explain the following: the function of the “Residue Tank;” how emissions from the “Residue Tank” are controlled; how the level and overflow are monitored and controlled for the “Decant Tank.”
16. Provide an unlocked, electronic Excel-compatible spreadsheet that contains the following information for each process line (Line 1 and Line 2) of the Santoflex process from March 2013 to the present:
 - a. A list of products;
 - b. The batch emission factors for each product in terms of pounds of VOM per batch and pounds of HAP per batch;
 - c. The number of batches of each product per month; and
 - d. The corresponding number of operating hours per batch.
17. Provide an unlocked, electronic Excel-compatible spreadsheet with the following information for each stripper located at the Facility associated with the Santoflex process from March 2013 to the present:
 - a. Stripper ID;
 - b. Specify whether the stripper operates continuously or in batch cycles;
 - c. The emission units routed to the stripper;
 - d. All of the operating parameter(s) monitored and the monitoring frequency at the stripper for environmental compliance (e.g., steam flow rate in kilograms of steam per liter of wastewater, wastewater feed temperature, minimum column operating temperature, liquid loading in liters per hour per square meter, pressure);
 - e. The operating parameter range established for regulatory compliance, the method used to establish the values (reference design evaluation and performance test as applicable), and the effective date of these operating limits;
 - f. The monitored operating parameter data;
 - g. If not already included above in parts (d)-(f) above, provide the stripper outflow temperature operating data;
 - h. The corrective action taken for each deviation from the parameter operating range;
 - i. The date and duration of all stripper shutdowns when the associated emission units are in operation, as well as an annual total (in hours) for each calendar year; and
 - j. Provide a narrative of how emissions ducted to each stripper are handled in the event of a stripper shutdown.

18. Provide an unlocked, electronic Excel-compatible spreadsheet with the following information for each thermal oxidizer at the Facility associated with the Santoflex process from March 2013 to the present:
 - a. Thermal oxidizer ID;
 - b. The emission units routed to the thermal oxidizer;
 - c. The recorded combustion temperature as used for regulatory compliance;
 - d. The minimum average operating temperature established for regulatory compliance, the method used to establish the values (reference design evaluation and performance test as applicable), and the effective date of these operating limits;
 - e. The monitored operating parameter data (including information related to whether the associated emission units were or were not operating);
 - f. The corrective action taken for each deviation from the minimum average combustion temperature; and
 - g. The date and duration of all thermal oxidizer shutdowns when the associated emission units are in operation, as well as an annual total (in hours).
19. Provide an unlocked, electronic Excel-compatible spreadsheet with the following information for each condenser at the Facility associated with the Santoflex process unit and storage tanks from March 2013 to the present:
 - a. Condenser ID;
 - b. The condenser capacity and average rate of material throughput;
 - c. The operating parameter(s) monitored at the condenser, specifying the monitoring frequency;
 - d. The operating parameter range, the method used to establish the values (reference design evaluation and performance test as applicable), and the effective date of these operating limits;
 - e. The monitored operating parameter data;
 - f. The corrective action taken for each deviation from the parameter operating range; and
 - g. The date and duration of all condenser shutdowns when the associated emission units are in operation, as well as an annual total (in hours).

20. Provide unlocked, electronic Excel-compatible spreadsheet with the following information for each carbon adsorber at the Facility from March 2013 to the present:
- Carbon adsorber ID;
 - Whether the carbon adsorber is regenerative or non-regenerative;
 - The emission units routed to the carbon adsorber;
 - The operating parameter(s) monitored at the carbon adsorber, specifying the monitoring frequency and the technique(s) and/or instrument(s) used;
 - The operating parameter range, the method used to establish the values (reference design evaluation and performance test as applicable), and the effective date of these operating limits;
 - The monitored operating parameter data;
 - The corrective action taken for each deviation from the parameter operating range;
 - The date and duration of all condenser shutdowns when the associated emission units are in operation, as well as an annual total (in hours); and
 - Dates the carbon adsorber was replaced.
21. Provide unlocked, electronic Excel-compatible spreadsheet, with attachments where needed, with the following information for each Santoflex tank (i.e. storage, wastewater, etc.) at the Facility from March 2013 to the present:
- Tank ID;
 - Installation date, specifying whether the tank has ever been replaced, reconstructed, and/or modified and when;
 - Tank dimensions;
 - Tank capacity, in gallons, with analysis of the capacity of the storage tank;
 - Inventory of materials stored in the tank;
 - Throughput of each tank in gallons per month; and
 - Maximum true vapor pressure of the material stored in the tank in pounds per square inch absolute (psia), with methods, supporting calculations, and records of any physical tests used to determine the maximum true vapor pressure.
22. From March 1, 2013 to the present, list the dates of any process changes, including but not limited to, changes in production capacity, production rate, feedstock type, and the dates that any emission control or recovery unit was replaced, removed, or added.
23. From March 1, 2013 to the present, list and describe any changes in ownership and/or names for all processes at the Facility.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by

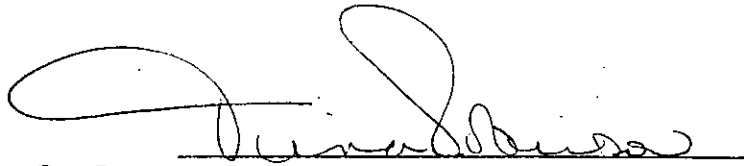
Certified Mail, Return Receipt Requested, to:

Donn Haines
Solutia, Inc. (Subsidiary of Eastman Chemical Company)
500 Monsanto Avenue
Sauget, Illinois, 62206

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by E-mail to:

Julie Armitage
Chief, Bureau of Air,
Julie.Armitage@Illinois.gov

On the 20th day of March 2018.


for Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 70150640000459655892